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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHAN JAMES EVANOVICH, AND
JONATHAN CURL

Defendants.

CASE NO. 2:24-CR-0079-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 9, 2024
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on May 9, 2024.
2. By this stipulation, defendants now move to continue the status conference until July 11, 2024, at 9:30 a.m., and to exclude time between May 9, 2024, and July 11, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes more than 13,000 pages of discovery consisting of investigative reports, financial documentation, phone extractions, photographs, and other documentary evidence, in addition to emails, audio and video recordings, and inventories. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendants Evanovich and Curl desire additional time to review discovery, research the charges and potential defenses, conduct independent investigation, and

consult with their clients.

c) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 9, 2024 to July 11, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 7, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JESSICA DELANEY
JESSICA DELANEY
Assistant United States Attorney

Dated: May 7, 2024

/s/ CHRISTINA SINHA
CHRISTINA SINHA
Counsel for Defendant
Stephan James Evanovich

1 Dated: May 7, 2024

/s/ KELLAN PATTERSON

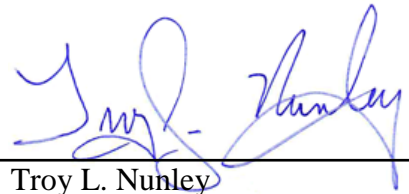
KELLAN PATTERSON

Counsel for Defendant

Jonathan Curl

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6 **ORDER**

7 IT IS SO FOUND AND ORDERED this 7th day of May, 2024.
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12 Troy L. Nunley
13 United States District Judge
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